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April 30, 2004

VIA HAND DELIVERY

Richard Collier, General Counsel
c/o Sharla Dillon, Docket & Records Manager
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee, 37243-0505

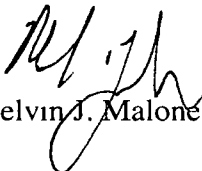
**RE: Tennessee Coalition of Rural Incumbent Telephone Companies and
Cooperatives Request for Suspension of Wireline to Wireless Number
Portability Obligations Pursuant to Section 251(f)(2) of the
Communications Act of 1934, as Amended
TRA Docket # 03-00633**

Dear Mr. Collier:

Enclosed please find one (1) original and thirteen (13) copies of Verizon Wireless's Response in Opposition to Petitioner's Motion for Suspension Pending Proceeding and Motion to Set Procedural Schedule.

If you have any questions or require additional information, please let me know.

Respectfully,


Melvin J. Malone

MJM/cgb
Enclosures

cc. R. Dale Grimes
Timothy C. Phillips

I.

BACKGROUND

In its Motion, the Rural Coalition “requests a suspension of all number portability obligations pending this proceeding pursuant to the last paragraph of 47 U.S.C. § 251(f)(2).”² Further, the Rural Coalition “moves the TRA to set a procedural schedule for discovery and resolution on its Amended Petition for Suspension.”³

II.

ARGUMENT

Verizon Wireless incorporates herein by reference the arguments against the Rural Coalition’s Amended Petition for Suspension as set forth in Verizon Wireless’ Opposition to Suspension Request and Petition to Intervene. The Rural Coalition is seeking to deny customers in Tennessee access to local number portability (“LNP”) by re-arguing issues already determined by the Federal Communications Commission (“FCC”). No petitioner has provided factual showings sufficient to meet its high burden to justify any suspension of the FCC’s LNP deadline of May 24, 2004. A careful review of the Amended Petition for Suspension, coupled with an examination of the FCC’s rules and orders on local number portability, leads to the conclusion that the Amended Petition for Suspension should be denied.

III.

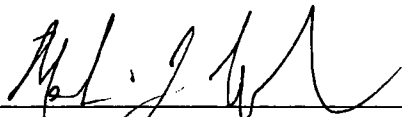
CONCLUSION

For the foregoing reasons, both the Motion and the Amended Petition for Suspension should be denied.

² Petitioner’s Motion for Suspension Pending Proceeding and Motion to Set Procedural Schedule, In Re Tennessee Coalition of Rural Incumbent Telephone Companies and Cooperatives Request for Suspension of Wireline to Wireless Number Portability Obligations Pursuant to Section 251(f)(2) of the Communications Act of 1934, As Amended, TRA Docket No. 03-00633, p. 1 (April 19, 2004)

³ *Id.* at 2

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'M. J. Malone', is written over a horizontal line.

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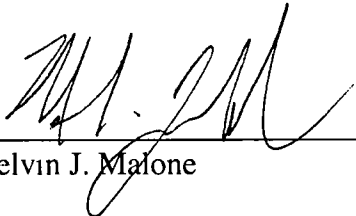
Anne Hoskins
Lolita Forbes
Counsel for Verizon Wireless

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served by U.S. Mail, postage prepaid, this 30th day of April, 2004, upon the following:

R. Dale Grimes
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